

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

CARLOS A. GARCIA PEREZ, ET AL

Plaintiffs

vs.

ALVARO SANTAELLA, M.D., ET AL

Defendants

CIVIL NO. 97-1703 (JAG)

JURY TRIAL DEMANDED

**MOTION FOR EXTENSION OF TIME TO ANSWER
COMPLAINT OR OTHERWISE PLEAD**

TO THE HONORABLE COURT:

Comes now American International Insurance Company of Puerto Rico, Inc., hereinafter AIICO, through the undersigned attorneys, and without submitting to the jurisdiction of this Honorable Court, respectfully states and prays as follows:

1. The appearing party was notified with a copy of the summons, complaint and the amended complaint in the captioned matter on October 20, 2004.
2. The appearing party requires a thirty (30) day extension of time to investigate the allegations of the amended complaint in order to responsibly prepare its responsive pleading.

WHEREFORE, it is respectfully requested that the Honorable Court take notice of this Motion and grant the appearing party an extension of thirty (30) days within which to submit it's answer to the amended complaint or responsive pleading. The requested extension of time would expire on December 5, 2004.

In San Juan, Puerto Rico, this 5th day of November, 2004.

I hereby certify that on November 5, 2004, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Andres Guillemard Noble, Esq., Joan S. Peters, Esq., Pedro J. Cordova, Esq., Angel R. De Corral Juliá, Esq., Marta E. Vilá Báez, Esq., Roberto Ruiz Comas, Esq., José Enrique Otero, Esq., José Hector Vivas, Esq., Igor J. Dominguez, Esq., Doris Quiñones Tridas, Esq., and Pedro Toledo González, Esq.

S/ JEANNETTE LOPEZ DE VICTORIA
JEANNETTE LÓPEZ DE VICTORIA
BAR NUMBER 205101

S/ ISABEL GUILLEN BERMUDEZ
BAR NUMBER 214206

PINTO-LUGO, OLIVERAS & ORTIZ, PSC
P.O. Box 9024098
San Juan, P.R. 00902-4098
Tel. 787-724-8103
Fax. 787-724-8152
e-mail: pintolugo@pintolaw.com
hoeman1959@aol.com
e-mail: guillenbermudezi@pintolaw.com